

## COUGHLIN DUFFY LLP

ATTORNEYS AT LAW

1. Time to respond  
Extended to 5/13/08.

2. Conference hearing  
rescheduled for 5/1/08  
SO ordered  
X3 b/koel

MEMO ENDORSED

USDS SDNY	330
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VIA HAND DELIVERY	

The Honorable John G. Koelzl  
United States District Judge  
Daniel Patrick Moynihan United States  
Courthouse  
500 Pearl Street, Room 1030  
New York, New York 10007-1312



Re: *Renee Smith v. PHH Corporation, et al.*, No. 08-CV-3018 (JGK)  
(S.D.N.Y.)

Dear Judge Koelzl:

We write on behalf of the defendants in the above-referenced matter, PHH Corporation and PHH Mortgage Corporation ("PHH"). Ms. Smith on behalf of herself and a purported class of New York residents filed this action on March 25, 2008. The Complaint was served on my clients on April 3, 2008. Accordingly, pursuant to Rule 12(a)(1)(A), my clients must respond to the Complaint on or before April 23, 2008. The purpose of this letter is to request an additional 20 days, or until May 13, 2008, in which to respond to the Complaint. Our firm was only recently retained in this matter and while we will be working with PHH's national counsel, we require additional time in which to prepare a response to the Complaint. We have contacted counsel for plaintiff and they have no objection to this request. This is our first request for adjournment.

Finally, we understand that an initial conference for May 1, 2008, at 4:30 p.m., although this does not appear on the docket sheet for the case. In light of our request for additional time to respond to the Complaint, we would also request that any initial conference be rescheduled until after PHH has filed a response to the Complaint. This additional time will allow us to meet with our clients and to be more fully prepared to discuss the case at the conference. Plaintiff's counsel objected to this request for a

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continuance and stated that they believe that the conference should be conducted on May 1, 2008.

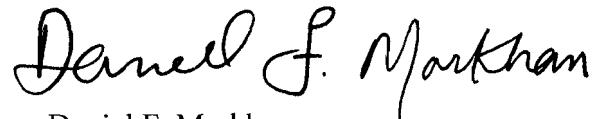
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We appreciate your Honor's consideration of this matter.

Respectfully submitted,



A handwritten signature in black ink, appearing to read "Daniel F. Markham".

Daniel F. Markham

Copies by facsimile to:

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